

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	
vs.	§	Criminal No. 3:12-CR-392-O
	§	ECF
TONY HERNANDEZ, et al	§	

GOVERNMENT’S DESIGNATION OF EXPERTS AND  
NOTICE OF INTENT TO OFFER EXPERT TESTIMONY

Pursuant to Federal Rule of Criminal 16, the United States respectfully advises the Court and defendants that the government intends to offer the testimony of the following witnesses at trial that may be construed as “expert testimony” under Federal Rule of Evidence 703.

**I. Potential expert witnesses**

**1. Brigid King**

Senior Forensic Chemist  
Drug Enforcement Administration South Central Laboratory  
10150 E. Technology Blvd.  
Dallas, Texas 75220

At trial, King will testify that the substances seized in this case that she examined were, in fact, methamphetamine hydrochloride, a Schedule II controlled substance. King will explain the results of the tests she performed as memorialized on the lab report, including, but not limited to chemical, physical and/or instrumental analyses, the testing methods used at the lab, including, but not limited to infrared spectroscopy/gas chromatography/mass spectrometry/liquid chromatography, the chain of custody of the samples, the gross/net weights of the methamphetamine, purity and its significance. King

will also testify about the different forms of methamphetamine (ICE, liquid, etc.) that she has tested and what makes them unique.

King holds a Bachelor of Science in Clinical Laboratory Science (1995) and a Master of Science in Forensic Toxicology (2001) from the University of Texas Health Science Center in San Antonio, Texas. King has worked at the DEA South Central Laboratory analyzing evidence for the presence of controlled substances since January 2002. A copy of her curriculum vitae will be provided to defense counsel in the next round of discovery.

**2. Darren Gayne**  
Forensic Chemist  
Drug Enforcement Administration South Central Laboratory  
10150 E. Technology Blvd.  
Dallas, Texas 75220

At trial, Gayne will testify that the substances seized in this case that he examined were, in fact, methamphetamine hydrochloride, a Schedule II controlled substance. Gayne will explain the results of the tests he performed as memorialized on the lab report, including, but not limited to chemical, physical and/or instrumental analyses, the testing methods used at the lab, including, but not limited to infrared spectroscopy/gas chromatography/mass spectrometry/liquid chromatography, the chain of custody of the samples, the gross/net weights of the methamphetamine, purity and its significance.

Gayne holds a Bachelors of Science in Chemistry (summa cum laude) (2004) from St. Bonaventure University in Olean, NY. King worked at the DEA South Central Laboratory analyzing evidence for the presence of controlled substances from February 2006 until March 2012. Thereafter, he began work with the DEA Aviation Intelligence Group. A copy of his curriculum vitae will be provided to defense counsel in the next

round of discovery.

**3. Lauren Woolridge**  
Forensic Chemist  
Southwest Institute of Forensic Sciences (SWIFS)  
2355 North Stemmons Freeway  
Dallas, Texas 75207

At trial, Woolridge will testify that the substances seized in this case that she examined were, in fact, methamphetamine hydrochloride, a Schedule II controlled substance. Woolridge will explain the results of the tests she performed as memorialized on the lab report, including but not limited to chemical, physical and instrumental analysis, the testing methods used at the lab, including, but not limited to, color tests, gas chromatography/mass spectrometry/flame ionization detector, the chain of custody of the samples, the gross/net weights of the methamphetamine, purity and its significance.

Woolridge holds a Bachelor of Science in Chemistry from Texas Woman's University (2006). Woolridge has worked at SWIFS analyzing evidence for the presence of controlled substances for the past 3.5 years and had worked at the St. Tammany Parish Sheriff's Office Crime Lab for 1.5 years. A copy of her curriculum vitae will be provided to defense counsel in the next round of discovery.

**4. Francisco Ortiz**  
Forensic Chemist  
Southwest Institute of Forensic Sciences (SWIFS)  
2355 North Stemmons Freeway  
Dallas, Texas 75207

At trial, Ortiz will testify that the substance seized in this case that he examined was, in fact, methamphetamine hydrochloride, a Schedule II controlled substance. Ortiz will explain the results of the tests he performed as memorialized on the lab report, including but not limited to chemical, physical and instrumental analysis, the testing

methods used at the lab, including, but not limited to, color tests, gas chromatography/mass spectrometry/flame ionization detector, the chain of custody of the samples, the gross/net weights of the methamphetamine, purity and its significance.

Ortiz holds a Bachelor of Science in Forensic Science from Baylor University (2009) and a Master of Science in Forensic Science from Sam Houston State University (2011). Ortiz has worked at SWIFS analyzing evidence for the presence of controlled substances for the past year. A copy of his curriculum vitae will be provided to defense counsel in the next round of discovery.

**4. Byron Boston**  
Task Force Officer  
Federal Bureau of Investigation (FBI)  
One Justice Way  
Dallas, Texas 75220

Boston will testify that he is a Task Force Officer assigned to the FBI, Dallas Field Division, in Dallas, Texas. Through his training and experience, Boston is knowledgeable about all aspects of drug trafficking organizations (DTOs), including, but not limited to, the organizational structure of DTOs, the hierarchy and ranks of DTO members, the various roles of members within DTOs, the methods by which DTOs import drugs into the United States, the methods utilized to transport drugs and/or drug proceeds, the methods used by DTOs to distribute drugs and collect drug proceeds, the methods of communication utilized by DTOs, including the use of cellular telephones and coded language, and the financial and accounting practices of DTOs, including the manner in which drugs are priced for distribution, the use of coded drug ledgers, the methods of payment for DTO members, and the methods utilized by DTOs to launder drug proceeds, including the practice of utilizing bulk cash smuggling.

Boston will testify about the aforementioned aspects and practices of DTOs. He will further testify that many of these same aspects and practices were present and utilized by the co-conspirators during this investigation. Boston will testify that during the time period set forth in the indictment, the defendants conspired with other individuals, known and unknown, to distribute narcotics, possess with intent to distribute narcotics, and launder drug proceeds derived from the sale those narcotics. Boston's expert opinions are based upon his training, experience and well-established principles of drug trafficking investigation.

Boston is a police officer with the Dallas Police Department, Narcotics Division, in Dallas, Texas. He has been a police officer for approximately 17 years and has investigated narcotic offenses for the past 15 years. His status a Task Force Officer (TFO) began with the Bureau of Alcohol, Tobacco and Firearms in 2003. He has participated in all of the normal methods of narcotics investigation, including, but not limited to, electronic and visual surveillance, general questioning of witnesses, the use of search warrants, the use of confidential informants, the use of pen registers and the use of undercover agents. He has also received specialized training in Title III (wiretap) investigations from the FBI/ATF and has attended numerous narcotics training conferences, as well as various other narcotics and general law training courses, pertaining to narcotics interdiction, confidential source handling, interviews and interrogation. He has conducted numerous federal and state investigations involving the sale, distribution, importation and smuggling of illegal narcotics and/or the laundering of proceeds derived from the sale thereof. He is also familiar with the means and methods involved in narcotics distribution, including the use of drug trafficking organizations and

the interpretation of coded language used by narcotic traffickers.

Respectfully submitted,

SARAH R. SALDAÑA  
United States Attorney

s/ John Kull  
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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2012, I electronically filed the foregoing document with the clerk of the court using the Electronic Case Filing “ECF” system which will send notification of such filing to the defense counsel(s).

s/ John Kull  
JOHN KULL  
Assistant United States Attorney